

**Amendments to the Drawings:**

The four (4) attached replacement sheets of drawings include changes to Figs. 2A, 2B, 2C, 2D, 3A, 3B, 4A, and 4B. These four (4) replacement sheets replace the original sheets including Figs. 2A, 2B, 2C, 2D, 3A, 3B, 4A, and 4B. In these drawings, each of the mentioned figures has been labeled --Prior Art--.

Attachment: Replacement Sheets (4)

## **REMARKS**

### **I. Status of Claims**

After the above amendments, claims 1-20 are pending. Claims 1, 10, and 16 are independent.

### **II. Drawings**

Applicant has amended the drawings to include the legend --Prior Art-- on Figs. 2A, 2B, 2C, 2D, 3A, 3B, 4A, and 4B. These amendments are being made in response to the Examiner's objection to the drawings. Accordingly, entry of the amendments is respectfully requested.

### **III. Rejection of Claims 1-20**

Claims 1-3, 7-8, 10-11, 15-17 and 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent Publication No. 2003/0142174 to Boyd et al. in view of U.S. Patent No. 6,739,712 B2 to Kim. Claims 4-6 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentably over the Boyd publication, the Kim patent, and U.S. Patent Publication No. 2004/0032468 to Killmeier. Claims 9, 12-13 and 18-19 stand rejected under 35 U.S.C. § 103(a) as being unpatentably over the Boyd publication, the Kim patent, and U.S. Patent No. 5,975,687 to Powers.

#### **A. The Rejection of Claims 1-20 is improper Because None Of The References Disclose Or Suggest A Separate Secondary Dam.**

The pending rejections are improper because the Examiner has not established a *prima facie* case of obviousness. Specifically, the Examiner has not established that all of the limitations of the pending claims are disclosed or suggested by the cited prior art references.

Each of the pending independent claims requires a first dam and a secondary dam that support a head chip (e.g., as exemplified by 17A and 55 in Figs. 5A, 5C and 5D). In particular, independent claim 1 requires "an ink feed hole including *a dam* on its perimeter to support the head chip, and *a separate secondary dam* of the same height as the dam," independent claim 10 requires "*a first dam* formed around the perimeter of the ink feed hole for supporting the head chip, and *at least one secondary dam* of the same height as the first dam for supporting the head chip," and claim 16 specifies "*a first dam* disposed about the ink feed hole on the bottom of the

receiving part for supporting the head chip, . . . and *at least one secondary dam* protruding outwardly from the bottom of the receiving part for supporting the head chip.”

None of the cited references discloses or suggests such first and second dams. Starting with the Boyd et al. reference, the Examiner admits that the Boyd et al. reference does not disclose a secondary dam. *See* p. 3, Office Action mailed November 7, 2006.

The next cited reference, the Kim ‘712 patent also does not disclose a secondary dam. The Examiner includes in the Office Action a drawing purporting to show first and second dams. The drawing is an elevational, *cross-sectional* view. *See* col. 2, lines 51-53, Kim ‘712 patent. Thus, *the alleged first and second dams are sections through the same dam*. Just because the same dam is shown in two different locations in an elevational, cross-sectional view does not make it two separate dams. There is only one dam in the Kim patent. There is no disclosure, nor is there a suggestion that there are two dams. By contrast, the longitudinal-axis, cross-sectional views in Fig. 5B of the present application exemplify a second dam 55.

The next two cited references, the Killmeier publication and the Powers patent, also do not disclose or suggest first and second dams.

Thus, none of the references discloses first and second dams. They each disclose, at most, a single dam. Thus, even if they were combined, the combination would only disclose, at most, a single dam. Consequently, the Examiner has not established a *prima facie* case of obviousness, and reconsideration and withdrawal of the rejections is respectfully requested.

#### IV. Conclusion

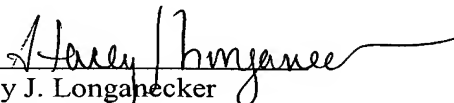
In view of the above, it is believed that the above-identified application is in condition for allowance, and notice to that effect is respectfully requested. Should the Examiner have any questions, the Examiner is encouraged to contact the undersigned at the telephone number indicated below.

Appl. No. 10/759,085  
Amdt. Dated February 7, 2007  
Reply to Office Action of November 7, 2006

The Commissioner is authorized to charge any fees or credit any overpayments which may be incurred in connection with this paper to Deposit Account No. 18-2220.

Respectfully submitted,

Date: February 7, 2007

  
Stacey J. Longanecker  
Reg. No. 33,952  
Attorney for Applicant

Roylance, Abrams, Berdo & Goodman, L.L.P.  
1300 19<sup>th</sup> Street, N.W., Suite 600  
Washington, D.C. 20036-2680  
Main: (202) 659-9076  
Direct: (202) 530-7372